



did not appear to intend for it to be distributed more widely. Finally, from the prospective of recidivism risk, the defendant's child abuse behavior appears to be contextual (a product of her dysfunctional relationship with White) rather than a result of a sexual interest in children or child pornography. Assuming she avoids a similar relationship when released, she seems to present a low recidivism risk, particularly when coupled with a term of supervised release of at least 10 years.

The agreed-upon disposition also would result in an imprisonment term meaningfully above the resulting guideline sentence the government is requesting for White, producing a reasonable comparative outcome given the relatively culpability of Koldis for creating and initially distributing the images and White for further distributing the images and engaging in child pornography trading behavior more generally.<sup>1</sup>

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*/s Michael D. Gadarian*

By:

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<sup>1</sup> The government reserves the right to respond to any defense arguments presented after the filing of this memorandum.